

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

JIMMY D. PINGLETON, an individual,)	
)	
)	
Plaintiff,)	
)	Case No. CIV 15-349-JHP
v.)	
)	
ROLLING HILLS HOSPITAL, LLC, an)	
Oklahoma Limited Liability Company,)	
)	
)	
Defendant.)	

JOINT MOTION TO DISMISS WITH PREJUDICE

Pursuant to Fed. R. Civ. P. 41(a), Plaintiff Jimmy D. Pingleton and Defendant Rolling Hills Hospital, LLC (collectively, the “Parties”) jointly move this Court to dismiss the above-captioned lawsuit with prejudice (the “Motion”). Each party has agreed to bear its own costs and expenses. A Proposed Order is attached hereto as **Exhibit 1**.

s/ Heath H. Edwards

Mark W. Peters (TN BPR # 018422)

Heath H. Edwards (TN BPR # 034076)

WALLER LANSDEN DORTCH & DAVIS, LLP

511 Union Street, Suite 2700

Nashville, TN 37219

(615) 850-8888

(615) 244-6804 (facsimile)

mark.peters@wallerlaw.com

heath.edwards@wallerlaw.com

Mike Carr, OBA #17805
Jessica Craft, OBA #31126
HOLDEN & CARR
210 Park Avenue, Suite 1140
Oklahoma City, OK 73102
(405) 813-8888
(405) 813-8889 (facsimile)
MikeCarr@holdenlitigation.com
JessicaCraft@holdenlitigation.com

*Attorneys for Defendant Rolling Hills Hospital,
LLC*

s/ Derek H. Ross (w/ permission)
Kevin R. Donelson, OBA No. 12647
Derek H. Ross, OBA No. 31699
**FELLERS SNIDER BLANKENSHIP BAILEY &
TIPPENS, P.C.**
100 N. Broadway, Suite 1700
Oklahoma City, OK 73102-9211
(405) 232-0621
(405) 232-9659 (facsimile)
KDonelson@FellersSnider.com
Dross@FellersSnider.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed electronically with the Court's CM/ECF system, which will automatically send e-mail notification of such filing to the following:

Kevin R. Donelson, Esq.
Derek H. Ross, Esq.
FELLERS SNIDER BLANKENSHIP BAILEY & TIPPINS, P.C.
Chase Tower
100 N. Broadway, Suite 1700
Oklahoma City, OK 73102

on this the 17th day of June, 2016.

/s/ Heath H. Edwards